

CLERK OF COURT  
DISTRICT OF MASS.

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

2004 DEC 23 P 5:05

DIRECT REPORT CORPORATION d/b/a  
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON  
CORPORATION, JOHN DOES 1 through 5,  
JANE DOES 1 through 5,

Defendants.

Civil Action

No. 04-10535 PBS

**PLAINTIFF SHAREHOLDER.COM'S MOTION TO COMPEL DEFENDANTS  
TO DESIGNATE A KNOWLEDGEABLE RULE 30(B)(6) REPRESENTATIVE  
AND TO PERMIT DESIGNEE TO TESTIFY TO FACTUAL INFORMATION**

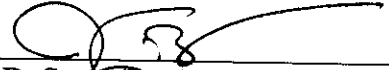
Plaintiff Shareholder.com respectfully requests that the Court order Defendants CCBN.com and The Thomson Corporation to (1) designate a new Rule 30(b)(6) corporate representative who is sufficiently prepared to address the noticed subject matters and (2) withdraw its unsupported privilege objections and permit the new Rule 30(b)(6) designee to testify to factual information. Shareholder.com has set forth the reasons why such relief is appropriate in its accompanying memorandum of law.

Pursuant to Local Rule 7.1, plaintiff's counsel certifies that they conferred with defendants' counsel and were unable to resolve the issues presented in this motion.

**REQUEST FOR ORAL ARGUMENT.**

Shareholder hereby requests oral argument on its motion.

Respectfully submitted,



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December 23, 2004

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party by hand on December 23, 2004.

